UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

JOHN RYAN,

Plaintiff,

v.

C.A. No. 1:21-cv-00222

ALASKA COMMUNICATIONS SYSTEMS GROUP, INC.; DAVID W. KARP; PETER D. AQUINO; WAYNE BARR, JR.; WILLIAM H. BISHOP; BENJAMIN C. DUSTER, IV; and SHELLY C. LOMBARD,

Defendants.

NOTICE OF MOTION FILED WITH THE UNITED STATES JUDICIAL PANEL ON MULTIDISTRICT LITIGATION FOR TRANSFER OF ACTIONS TO THE DISTRICT OF DELAWARE PURSUANT TO 28 U.S.C. § 1407 FOR COORDINATED OR CONSOLIDATED PRETRIAL PROCEEDINGS

PLEASE TAKE NOTICE that, on February 19, 2021, Defendants Alaska Communications Systems Group., Inc., David W. Karp, Peter D. Aquino, Wayne Barr, Jr., William H. Bishop, Benjamin C. Duster, IV, and Shelly C. Lombard (the "Alaska Defendants"), filed a motion with the United States Judicial Panel on Multidistrict Litigation ("JPML"), pursuant to 28 U.S.C. § 1407, to transfer twelve actions pending in four different federal district courts (including the above-captioned action) to the United States District Court for the District of Delaware for coordinated or consolidated pretrial proceedings. The motion is currently designated as MDL "Case Pending No. 8" under the caption *In re Alaska Communications Systems Group, Inc. Securities Litigation*.

Pursuant to 28 U.S.C. § 1407(c)(ii) and Rule 6.2(a) of the JPML Rules of Procedure, Defendants are filing herewith copies of the Motion of Alaska Defendants for Transfer of Actions

to the District of Delaware Pursuant to 28 U.S.C. Section 1407 for Coordinated or Consolidated Pretrial Proceedings, Brief in Support of Alaska Defendants' Motion for Transfer Pursuant to 28 U.S.C. Section 1407; Schedule of Actions; docket sheets and complaints for all pending Actions; and Proof of Service.

OF COUNSEL:

Andrew W. Stern (*pro hac vice* forthcoming) Charlotte K. Newell (#5853) Vincent J. Margiotta (*pro hac vice* forthcoming) SIDLEY AUSTIN LLP 787 Seventh Avenue New York, NY 10019 (212) 839-5300

Dated: February 19, 2021

POTTER ANDERSON & CORROON LLP

By: /s/ Kevin R. Shannon

Kevin R. Shannon (#3137) Christopher N. Kelly (#5717) 1313 N. Market Street, 6th Floor Wilmington, DE 19801 (302) 984-6000 kshannon@potteranderson.com ckelly@potteranderson.com

Counsel for Defendants Alaska Communications Systems Group., Inc., David W. Karp, Peter D. Aquino, Wayne Barr, Jr., Bill Bishop, Benjamin C. Duster, IV, and Shelly Lombard